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November 30, 2020

Honorable Arlene R. Lindsay
United States District Court
Eastern District of New York
814 Federal Plaza
Central Islip, New York 11722

VIA ECF

Re: *Galloway v. Nassau County, et al.*
Docket No. 19-cv-5026 (AMD)(ARL)
File No. 190164

Dear Judge Lindsay:

We represent defendants the County of Nassau, Det. Matthew Ross, Det. Charles DeCaro, Det. Ronald Lipson, Det. Thomas Dluginski, Det. George Darienzo, Det. Sgt. Richard Dorsi, Det. Rene Yao, and Det. Carl Strange (the "County Defendants") in this matter. We write to request a one-month extension of the current discovery schedule.

Since it commenced in April 2020, discovery has progressed considerably, especially in light of the ongoing public health crisis. The parties exchanged initial disclosures, discovery responses, and tens of thousands of pages of documents. We have also completed 19 depositions.

Despite our best efforts to comply with the current schedule, additional fact discovery remains. This includes additional paper discovery and several depositions. We attempted in good faith to complete this discovery before the December 2, 2020 deadline. However, the complications caused by the public health crisis and the press of other matters have prevented us from doing so.

Accordingly, we respectfully request a one-month extension to complete discovery, resulting in the following revised schedule:

Fact discovery to be completed by:	January 4, 2021
Plaintiff's expert disclosures due by:	March 8, 2021
Defendants' expert disclosures due by:	May 5, 2021

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All discovery, including all expert disclosures
Under Rule 26(a)(2), if any, to be completed by: June 4, 2021

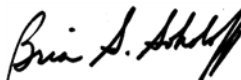
Dispositive motion process started by: July 7, 2021

Joint pretrial order due by: August 2, 2021

The parties conferred to discuss this request. The Village Defendants consent to it. Plaintiff takes no position.

Thank you for your consideration of this matter

Very truly yours,
SOKOLOFF STERN LLP


Brian S. Sokoloff

cc: All counsel

VIA ECF